

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NELLY FELIZ,

Plaintiff,

- against -

JPMORGAN CHASE & CO.,

Defendants.

Civil Action No. 07-CV-05694 (RJH)

JUNE 19, 2007

MOTION FOR EXTENSION OF TIME

Pursuant to Rule 6(b) of the *Federal Rules of Civil Procedure*, Defendant JPMorgan Chase Bank, N.A., sued incorrectly herein as JPMorgan Chase & Co. (“JPMorgan”), hereby moves the Court for an extension of time of seven (7) days, until June 26, 2007, in which to answer the Complaint in this action. In support of its motion, JPMorgan states as follows:

1. On or about April 30, 2007, plaintiff Nelly Feliz (“Plaintiff”) filed a summons and verified complaint (the “Complaint”) in the Supreme Court, New York County, where the matter was assigned Index No. 105839-07.
2. On May 15, 2007, a copy of the Complaint was served on JPMorgan via the New York Secretary of State.
3. On June 14, 2007, JPMorgan removed this action to federal court.
4. JPMorgan requires a short extension of time of seven (7) days to decide how to respond to the Complaint.
5. The undersigned counsel took over this case very recently from previous counsel.

6. The undersigned counsel left several messages with Plaintiff's counsel in an effort to ascertain whether Plaintiff's counsel would stipulate to the requested extension. However, Plaintiff's counsel never returned any of the undersigned counsel's messages.

WHEREFORE, defendant JPMorgan Chase Bank, N.A. requests an extension of time of seven (7) days, until June 26, 2007, to file an answer to the complaint.

Dated: New York, New York
June 19, 2007

/s/ Joseph R. Geoghegan
Joseph R. Geoghegan (JG 7693)
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CERTIFICATE OF SERVICE

I certify that on the 19th day of June 2007, I caused a true copy of defendant's Motion for Extension to be served upon the following party, via first-class U.S. Mail, postage prepaid.

Dated: June 19, 2007

/s/ Joseph R. Geoghegan
JOSEPH R. GEOGHEGAN

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